

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

RYANAIR DAC,

Plaintiff,

v.

C.A. No. 20-01191-LPS

BOOKING HOLDINGS INC.,
BOOKING.COM B.V., KAYAK
SOFTWARE CORPORATION,
PRICELINE.COM LLC, and AGODA
COMPANY PTE. LTD,

Defendants.

**BOOKING HOLDINGS INC., BOOKING.COM B.V., KAYAK SOFTWARE
CORPORATION, PRICELINE.COM LLC, and AGODA COMPANY PTE. LTD'S
MOTION TO DISMISS PLAINTIFF'S COMPLAINT OR, IN THE ALTERNATIVE, TO
STAY**

Defendants Booking Holdings Inc., Booking.com B.V., Kayak Software Corporation, Priceline.com LLC, and Agoda Company Pte. Ltd., by and through their undersigned counsel, hereby move this Court on grounds of *forum non conveniens* and extraterritoriality for an order dismissing the Complaint with prejudice, or, in the alternative, staying the case. The grounds for this motion are fully set forth in the accompanying brief and supporting papers filed concurrently with this motion.

OF COUNSEL:

John H. Hemann
Kathleen Hartnett
Lauren Pomeroy
COOLEY LLP
101 California St., 5th Fl.
San Francisco, CA 94111
(415) 693-2200
jhemann@cooley.com
khartnett@cooley.com
lpomeroy@cooley.com

Dated: January 21, 2021

/s/ Jeffrey L. Moyer

Jeffrey L. Moyer (#3309)
Valerie A. Caras (#6608)
Richards, Layton & Finger, P.A.
One Rodney Square
Wilmington, DE 19801
(302) 651-7700
moyer@rlf.com
caras@rlf.com

Attorneys for Defendants